

APPEAL BRIEF

SUMMITTED TO BOARD OF APPEAL
IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Appellant: Bo-In Lin

For the Patent Application: Pending as indicated below:

In re application of: Bo-In Lin	:Date: January 31, 2010
Serial No.: 09/483,317	:Group No.: 2176
Filed: January 14, 2000	:Examiner: Laurie A. Ries
Attorney Docket No.: L&C-9901	:@(571)272-4095, 273-8300 (F)

I) Real Party in Interest:

The real party in interest is Bo-In Lin, the Appellant as the Applicant of this Patent Application.

II) Related Appeals and Interferences:

The is no related appeals and interferences of the above referenced Patent Application as of now.

III) Status of Claims:

Claims Amended and Rejected:

Claims 1 -10 and claims 12 -21 Amended and Rejected

Claim Previously Presented and Rejected:

Claim 11

Claims that areAppealed:

Claims 1 to 21 are appealed

IV) Status of Amendments:

Final Rejection of Claims 1 to 21 after Request of Continuous Examination.

V) Summary of Claimed Subject Matter:**1) Claim 1 as First Independent Claim:**

A naming-term based and graphically aided document management and review processing system implemented in a computer that includes three elements: (Page 5, line 25 to 26)

- 1) a document reading processing module that reads a single document having textual descriptions and a drawing having a plurality of graphic elements with each of said graphic element assigned and illustrated with an unique alpha-numeral designation and described in the textual descriptions with a specific "naming term" associated with the alpha-numeral designation; (Page 5, line 26 to Page 6, line3)
- 2) a search and link processing module to search and link the graphic element designate by the alpha-numeral designation with at least one associated segment of the textual descriptions that includes and describe a naming term designated by said alpha-numeral designation illustrated by said graphic element; and (Page 6, line 5 to line 9)
- 3) a display processing module for displaying the drawing with the naming-term designated by the alpha-numeral designation and the name term is displayed immediately and directly next to the graphic element for a document reviewer to directly and graphically view and associate the graphic element together with said naming term described in the textual descriptions. (Page 7, line 25 to line 27 and Fig. 4A)

2) Claim 7 as Second Independent Claim:

A method of processing a naming-term based and graphically aided document review and management comprising: (Page 5, line 25 to 26 and Page 6, line 29 to 33)

- a) employing a document reading processing module for reading a single document having textual descriptions and at least a drawing having a plurality of graphic elements wherein each of said graphic elements is assigned and illustrated with an unique alpha-numeral designation specific to the graphic element; (Page 5, line 25 to line 30)

- b) converting said document including said graphic elements and said alpha-numeral-designation to a plurality of processor-recognized elements and incorporating said textual descriptions and said plurality of processor-recognizable elements into a single processor-recognizable file; (Page 5, line 30 to line 35)
- c) employing a search and link processing module for searching within said single processor-recognizable file for said processor-recognized elements and linking each of said alpha-numeral designation with at least one associated segment of textual description including and describing a naming term and designated by said alpha-numeral designation in said at least one associated segment of textual description; and (Page 6, line 5 to line 16)
- d) displaying said drawing with said naming-term as designated by said alpha-numeral designation and described in said at least one associated segment of said textual description wherein said name term is displayed immediately and directly next to said graphic element marked by said alpha-numeral designation whereby a document reviewer can directly and graphically view and associate said graphic element together with said naming term as described in said textual descriptions. (Page 7, line 25 to line 27 and Fig. 4A)

3) The third independent claim 13:

A naming-term based and graphically aided document review and management system implemented in a computer for reading a single document having textual descriptions and at least a drawing consisted of graphic elements wherein each graphic element is designated with an unique alpha-numeral designation specific to said graphic element and associated with a naming term included and described in said textual description in said single document incorporated in a single processor-recognizable file, comprising: (Page 5, line 25 to 26 and Page 6, line 29 to 33)

a display processing module for displaying said drawing with said naming term as designated by said alpha-numeral designation and described in said at least one associated segment of said textual descriptions wherein said naming term is displayed immediately and directly next to said graphic element whereby a document reviewer can directly and

simultaneously view and associate said naming term as described in said textual description to said graphic element illustrated and designated with said unique alpha-numeral designation as said alpha numeral designation designating said naming term without requiring a processor to process multiple files. (Page 7, line 25 to line 27 and Fig. 4A)

4) The fourth independent claim 18:

A method for reading and managing a single document having textual descriptions and at least a drawing consisted of graphic elements each designated with an unique graphic element designation and associated with a naming term assigned by an unique alpha-numeral designation the same as one of said graphic element designation and described in one of said textual descriptions of said single document incorporated in a single processor-recognizable file, comprising: (Page 5, line 25 to 26 and Page 6, line 29 to 33)

employing a display processing module for displaying said drawing with said naming term included and described in said textual description for displaying said naming term immediately and directly next to said graphic element assigned by said unique graphic element designation the same as the alpha-numeral designation of said unique naming term described in said textual descriptions whereby a document reviewer can directly and simultaneously view and associate said naming term described in said textual descriptions to said graphic element without requiring a processor to process multiple files. (Page 7, line 25 to line 27 and Fig. 4A)

VI) Grounds of Rejection to be reviewed on Appeal:

- 1) Rivette teaches the display of both graphics and associated text including the column and line numbers of said text on the screen immediately next to one another in both fig. 33, col. 3 line 66 to col. 4 line 5, and col. 4 lines 19-24. Fig. 33 shows and col. 4 lines 19-24 explains a patent image window immediately next to a window of associated text. What Rivette does not teach is each descriptive**

naming-term displayed immediately next to the graphic elements and the alpha-numeral designation assigned to each graphic element whereby a user can select an alpha-numeral designation or a descriptive naming term to display of the associated segment of textual description associated with said alpha-numeral designation or descriptive naming term.

- 2) Krause teaches each descriptive naming-term displayed immediately and directly next to the graphic elements in fig. 3-5 and col. 5 lines 7-18. See specifically Krause, Figure 5, showing a descriptive naming term, such as "building paper", for example, displayed immediately and directly next to said graphic element. The graphic elements and the text labels and text descriptions are all readily available to the user on one screen. Krause teaches in col. 5 lines 7-13 that both a name and label are placed upon the graphic at each of a plurality of hotspots. Furthermore, Krause teaches in fig. 3b that each hotspot has unique coordinates to uniquely identify each hotspot and consequently each graphic element identified by each hotspot is likewise uniquely identified by individual coordinates related to the location of the hotspot. Krause teaches in col. 5 lines 14-18 that a user may select, using a mouse or keyboard, said hotspot to display an associated segment of textual description. Krause teaches that the hotspots annotate a primary document and link to a textual description in a secondary document. These documents could be document parts for example in a hierarchical compound document and thus the textual description invoked by the hotspot could be part of the same document as the graphical document containing the hotspot. Additionally Krause teaches that the descriptive naming term may be described in at least one associated

segment of a textual description also displayed immediately and directly next to said graphic element (See Krause, Figure 6, showing descriptive naming term "1/A34" displayed with textual description "Soffit Section" immediately and directly next to a graphic element of a soffit section). It would have been obvious to one of ordinary skill in the art at the time the invention was made to have modified Rivette with Krause and teachings of Applicant's disclosure to have created the claimed invention. One of ordinary skill in the art would have taken the text of Rivette and used it to replace the numbered labels on the images, as is done in Krause, through the use of automatic link generation systems and techniques which Applicant's specification teaches were readily available in the market. It would have been obvious and desirable to make this modification such that the combined image and text information would have been easier to read.

VII) Argument

In response to Examiner's rejections, the "naming term" in the independent claims, i.e., claims 1, 7, 13, and 19 are amended to clearly and definitely specified as a term that satisfied all three conditions set forth below:

- 1) A naming term is a term described in a textual description.
- 2) A naming term is a term that is designated in the textual descriptions with a unique alpha-numeral designation.
- 3) A naming term is a term shown as a graphic element in a drawing of the document designated by the same unique alpha-numeral designation.

In this invention, each graphic element is designated by a "unique alpha numeral designation" that is specific to the graphic element. This unique designation is necessary because it is necessary to search a naming term that is also assigned by this unique alpha numeral designation to associate with a

graphic element and then display the naming term next to the graphic element. The search and display depend on a unique alpha numeral designation for each graphic element.

With the amendment, compared to Fig. 5 of Krause, the amended claims 1, 7, 13 and 19 would not be obvious under Rivette and Krause and would be allowable. Specifically, Krause discloses on Fig. 5 an unique alpha-numeral designations of "65" designated to a naming term "window" (see column 9, line 24, and line 26), and in Fig. 4, another unique alpha-numeral designation 55 designating another naming term "hotspots" (see column 7, line 44, and line 50-51). However, none of the naming terms "window" or "hotspots" have been displayed next to the graphic elements. Furthermore, the alpha-numeral designations A, B, C, are designated to "hotspot". However, Krause did not show the naming term "hotspot" next to any of the graphic elements designated by the unique alpha-numeral designations A, B, or C. For these reasons, the naming term as now amended and more clearly defined as now included in the amended claims would differentiate further from the disclosures made by Rivette and Krause. A combination of Rivette and Krause would not enable a person of ordinary skill to devise the inventions directed by the claims as now amended because Krause did not show a display any of the naming terms assigned by an unique alpha-numeral designation (both in the textual descriptions and to the graphic element), next to the graphic element(s) as now more clearly specified in this invention.

Furthermore, the Applicant would like to respond to Examiner's points as recited in the Office Action mailed on November 3, 2090.

On pages 55 and 56 the Examiner recites that:

"Krause teaches a descriptive naming term, such as "fixed base clip", as shown in Figure 5, which is a descriptive naming term descriptive (i.e. comprehensively understandable by the reader) of the graphic element shown in Figure 5 and depicting a fixed base clip. These descriptive naming terms taught by Krause identify and describe the graphic elements to which they are associated and are displayed on the drawing immediately next to the graphic element to which they are associated, as clearly shown by Krause in Figure 5,

as well as in Krause Figure 6, which presents additional examples of textual phrases that identify graphic elements and that are displayed immediately next to the graphic elements they identify, such as, by way of example, "Soffit Section" (See Krause, Figure 6)."(Underline added)

Applicant's Response:

The Applicant would like to respectfully disagree with the Examiner about Examiner's point that "Krause teaches a naming term" because Krause shows the terms "Fixed Base Clip" and "SOFFIT SECTION" in Figs. 5 and 6. The Examiner provides bases for identifying these terms as "naming term" because these terms are comprehensively understandable by the reader of the graphic element. However, according to the clear and specific languages in claims 1, 7, 13 and 19, a term appears on the drawing that is merely "comprehensively understandable by the reader of the graphic element" is NOT a "naming term". The graphic elements "Fixed Base Clip" and "SOFFIT SECTION" in Figs. 5 and 6 are NOT assigned by any alpha-numeral designation. Furthermore, even if they are naming terms, there is now way to conduct a search to associate the naming term "Fixed Base Clip" and "SOFFIT SECTION" with a segment of the textual descriptions. According to this invention, the search depends on the unique alpha-numeral designation to associate the naming term and the textual descriptions to the graphic element both assigned by the same alpha-numeral designation based on the claims of this invention.

In contrast, the invention as disclosed of Krause does not require such an association because Krause relies on the "hotspots" to call up another file or document. According to Krause "The "A" hotspot will call up a textual description which is a note or text file named A in memory 30 as illustrated in Fig. 5" (Krause column 9, line 37 to 39). The association process and mechanism for reviewing the documents of Krause is totally different from this invention. For this reason, the disclosures as made by Figs. 4 to 7 and the descriptions of these figures in Krause point to a different invention and a combination of Krause and Rivette would not make this invention obvious. Furthermore, there are differences that clearly differentiate the invention according to the claims now amended are different from Krause and Rivette because of the following reasons:

- A) The terms "Fixed Base Clip" and "SOFFIT SECTION" as shown in Figs. 5 and 6 ARE NOT naming terms because these terms have not been described in the textual descriptions.
- B) . The terms "Fixed Base Clip" and "SOFFIT SECTION" as shown in Figs. 5 and 6 ARE NOT naming terms because these terms have not been designated by alpha-numeral designation in the textual description.
- C) The terms "Fixed Base Clip" and "SOFFIT SECTION" as shown in Figs. 5 and 6 ARE NOT naming terms because these terms have not been designated by alpha-numeral designation as a graphic element in the drawings shown in Figs. 5 and 6.
- D) The terms "Fixed Base Clip" and "SOFFIT SECTION" as shown in Figs. 5 and 6 ARE NOT naming terms because these terms cannot provide a link between the textual descriptions and the graphic element due to the facts that the graphic elements "Fixed Base Clip" or "SOFFIT SECTION" as shown in Figs. 5 and 6 have not been designated by a unique alpha-numeral designation. There is no way to link these graphic elements to relevant textual descriptions that describe a graphic element associated by the unique alpha-numeral designation.

II) For claims 1, 7, 13, and 19, the Examiner recites the following statements as provided on page 10 to 12 for claim 1 (and essentially similar reasons of rejections are provided as that for claim 1 are also recited for claims 7, 13, and 19). The Applicant would like to respectfully respond to each point as the followings:

- 1) **Examiner's Reason for Rejection:** While Rivette does not teach expressly that the textual descriptions include describing said descriptive naming term designated by said alpha-numeral designation, Krause teaches textual descriptions included in a secondary document that describes said descriptive naming term, such as describing the descriptive naming term which is designated by said alpha numeral designation "A" (See Krause, Figure 5, element 65).

Applicant's Response:

- a) From the above statements as cited by the Examiner, the Applicant is not sure which is considered as the alpha-numeral designation. Is it "A" the alpha-numeral designation or "65" the alpha-numeral designation? The

Examiner seems to imply that both "A" and "65" are alpha-numeral designations.

- b) Suppose both "A" and "65" are alpha-numeral designations, Fig. 5 does not show a "naming term" together with either "A" or "65". Therefore, what have been shown on Fig. 5 would not make the invention of this application obvious since there is no naming term shown immediately next to the alpha-numeral designations of the graphic elements.
 - c) Even that what recited by the Examiner that "Krause teaches textual descriptions included in a secondary document that describes said descriptive naming term, such as describing the descriptive naming term which is designated by said alpha numeral designation "A"" is true, it would still not make this invention obvious because what can be called up by "A" is not specifically shown in Fig. 5, as that required by the claims of this invention, and a document reviewer is still required to call up another document (either a note or a textual file" to understand what are represented by hotspot "A".
- 2) **Examiner's Reason for Rejection:** Krause teaches each descriptive naming-term displayed immediately and directly next to the graphic elements in fig. 3-5 and col. 5 lines 7-18. See specifically Krause, Figure 5, showing a descriptive naming term, such as "building paper", for example, displayed immediately and directly next to said graphic element. The graphic elements and the text labels and text descriptions are all readily available to the user on one screen.

Applicant's Response:

- a) From the above statements as cited by the Examiner, the Applicant is not sure if "building paper" is a "naming term" and what is pointed by "building paper" through an arrow is actually and indeed a "building paper" (i.e., paper covering over a vertical wall as "building paper"). Instead, a detail reading of the entire document and the descriptions of Fig. 5 would more likely indicate that the term "building paper" is not meant to show there is a "building paper" that covers the vertical wall pointed by the arrow next to the "building paper". More likely, the term "building paper" is an indicator of a "secondary document" (that is a "building plan), within a primary document. (See the description of Krause in column 9, lines 17 to 44, on "secondary document" and the "primary document" shown in different "windows 65").

- b) If the "building paper" is a naming term, then Fig. 5 and 6 do not show that "building paper" is assigned with an alpha-numeral designation. The Examiner recites that "the text labels and text descriptions are all readily available to the user on one screen", but the text labels "A". "B" are hotspots and have nothing to do with the "building paper" as a naming term, and the text descriptions shown in these figures are not related to the term "building paper" and would not help a document reviewer to understand the graphic element pointed by the "building paper". The only way that can help the reviewer is for the reviewer to call up the "building paper", i.e., another building plan as a "second document".
- c) According to above discussions, Krause teaches a totally different way of reviewing and understanding the building plans and construction blueprints. The disclosures made by Krause would not have been relevant because of these differences.
- 3) **Examiner's Reason for Rejection:** Krause teaches the hotspots annotate a primary document and link to a textual description in a secondary document. These documents could be document parts for example in a hierarchical compound document and thus the textual description invoked by the hotspot could be part of the same document as the graphical document containing the hotspot. Additionally Krause teaches that the descriptive naming term may be described in at least one associated segment of a textual description also displayed immediately and directly next to said graphic element (See Krause, Figure 6, showing descriptive naming term "1/ A34" displayed with textual description "Soffit Section" immediately and directly next to a graphic element of a soffit section).

Applicant's Response:

- a) According to the convention of the drawings as shown in Figs. 4 to 7, the symbol "1/ A34" is enclosed in a circle. The symbol "1/ A34", enclosed in a circle, like other symbols "A", "B" and "C" in a circle, is a "hotspot", and not a "naming term". (Please see Fig. 4 and the description of the alpha numeral designation "55" as hotspots".)
- b) A person of ordinary skill in document review and management when review the disclosure made by Krause would not misunderstand "1/ A34" shown in a circle as a "naming term" and "softfit section" as "textual description" of the naming term.

- c) Krause actually applies the hotspot “1/ A34” as a hotspot to call up another document to review the details of the “soffit section”. The soffit section is a name of the “hotspot 1/ A34” and not a textual description because “soffit” is not a descriptive word and cannot explicitly and comprehensively describe the graphic element. A document must call up another document linked by the hotspot 1/ A34 in order to more comprehensively understand the details of the building plan and the construction blueprints.
- d) For these reasons, Krause teaches a totally different system and process to manage, retrieve and review document. A combination of Krause and Rivette would not enable a person of ordinary skill to devise a document review system as now direct by the claims as now amended.

- 4) **Examiner's Reason for Rejection:** It would have been obvious to one of ordinary skill in the art at the time the invention was made to have modified Rivette with Krause and teachings of Applicant's disclosure to have created the claimed invention. One of ordinary skill in the art would have taken the text of Rivette and used it to replace the numbered labels on the images, as is done in Krause, through the use of automatic link generation systems and techniques which Applicant's specification teaches were readily available in the market. It would have been obvious and desirable to make this modification such that the combined image and text information would have been easier to read.

Applicant's Response:

- a) Krause is a system to review and manage building plan and blueprints that are mostly graphic documents with very little textual descriptions, i.e. "note" that are brief descriptions, because the reviewing of the graphic is more important for these types of documents.
 - b) For reviewing of building plans and blueprints, it is more important to check different levels of details and therefore it is important to call up several levels of "primary documents" and "second documents". The disclosure of Rivette is to manage patent applications. The natures of these two systems are totally different in terms of the interests and emphases of reviewing the documents. Therefore, a person of manage a patent document would not like to refer to a document review system for managing hierarchical level of building plan files relevant.
 - c) As discussed above, since Kraus did not disclose the naming term assigned by unique alpha-numeral designation displayed with textual descriptions or naming term with the alpha-numeral designation, even a combination of Rivette with Krause would not enable a person of ordinary skill in the art to create a display as now pointed by the claims as now amended.
- 5) **Examiner's Reason for Rejection:** It is noted that in the example immediately above, "bolt" is the same thing as "12." Displaying one or the other in association with a graphic fully identifies the graphic. Associating both the name "bolt" and the number "12" in association with the graphic is more informative, but essentially duplicative. This relationship is noted in support of the conclusion that it would have been obvious to one of ordinary skill in the art at the time of the invention to identify a graphic by either the name or the number or both. The

motivation for using both is for convenience is not having to look up the name associated with the number, or the number associated with the name. Therefore, it would have been obvious to one of ordinary skill in the art at the time of the invention to have modified the invention of Rivette, according to the teachings of Krause to display both a name and a number for a graphic item, as is specified in claim 1.)

Applicant's Response:

- a) The Applicant is confused by this statement because the Office Action does not seem to make reference to ""bolt" is the same thing as "12."
- b) Even that the "bolt" and "12" are meant to be pointing to the same graphic item, a graphic element merely shown with "12" may not be sufficient comprehensive to a document reviewer. The Examiner is correct that a display that shows the term "bolt" together with "12" would provide a reviewer more information to better understand the drawings and that is the main purpose of this invention.
- c) However, the Applicant would respectfully disagree with the Examiner that such display is obvious merely because "bolt" and "12" together with "textual descriptions" would be obvious. As discussed above, neither Rivette and Krause show such display, this invention disclose new, different and not obvious inventions over the disclosures over Rivette in view of Krause.

For the above reasons, the claims 1-21 would be non-obvious in view of the cited prior art references.

With the claims as now presented and the reasons provided above, the applicant hereby respectfully requests that Examiner's rejections under 35 USC § 103 be withdrawn and the present application be allowed.

VIII) Claims Appendix

1. (Currently Amended) 1. A naming-term based and graphically aided document management and review processing system implemented in a computer comprising:

a document reading processing module for reading a single document having textual descriptions and at least a drawing having a plurality of graphic elements wherein each of said graphic elements is assigned and illustrated with an unique alpha-numeral designation specific to the graphic element and described with said alpha-numeral designation designating a naming term and described in said textual descriptions, wherein said document reading processing module is further provided for converting said graphic element assigned with said alpha-numerical designation and said textual descriptions to a plurality of processor-recognized elements and incorporating said textual descriptions and said plurality of processor-recognized elements in a single processor-recognizable file;

a search and link processing module for searching within said single-processor recognizable file for linking said processor-recognized elements with said alpha-numeral designation with at least one associated segment of said textual descriptions including and describing said naming term designated by said alpha-numeral designation illustrated by said graphic element; and

a display processing module for displaying said drawing with said naming-term as designated by said alpha-numeral designation and described in said at least one associated segment of said textual description wherein said name term is displayed immediately and directly next to said graphic element illustrated with said alpha-numeral designation assigned to said graphic element whereby a document reviewer can directly and graphically view and associate said graphic element together with said naming term described in said textual descriptions.

2. (Currently Amended) The document management and review system implemented in the computer of claim 1 wherein:

said search and link processing module for searching and linking said associated segment of textual description including and describing said naming term designated by said alpha-numeral designation assigned to said graphic element further includes a document-location-finder processing module for locating a column number, a page number, and a line-range number for said associated segment of textual description in said single document; and

said display processing module is further provided for displaying said column number, said page number, and said line-range number for said segment of textual description for said naming term described in said textual descriptions next to said alpha-numeral-designation with said naming term described in said textual descriptions displayed immediately and directly next to said graphic element.

3. (Currently Amended) The document management and review system implemented in the computer of claim 1 further comprising:

a user interface provided for allowing a user to input a user-selected naming-term to invoke said search and link processing module for searching within said single processor-recognizable file incorporating said single document for said user-selected naming-term and linking said user-selected naming-term to at least an associated segment of textual description including and describing said user selected naming term designated with an alpha-numeral designation and linking to an associated graphic element in said document and for displaying said associated segment of textual description immediately and directly next to said associated graphic element whereby said document reviewer can directly and graphically view and associate said associated graphic element with said user selected naming-term simultaneously.

4. (Currently Amended). The document management and review system implemented in the computer of claim 1 further comprising:

a database for said single processor-recognizable file incorporating said single document for listing said alpha-numeral designation with said naming term and said at least one associated segment of said textual descriptions wherein said at least one associated segment of said textual descriptions includes and describes said naming term designated by said alpha-numeral designation and illustrated in a graphic element in said drawing.

5. (Currently Amended) The document management and review system implemented in the computer of claim 2 further comprising:

a user interface provided for allowing a user to input a user-selected naming-term to invoke said search and link processing module for searching within said single processor-recognizable file incorporating said single document for said user-selected naming-term and for linking said user-selected naming-term to an associated segment of textual description including and describing said naming term related to said user selected naming term wherein said naming term is designated with an alpha-numeral designation for linking to an associated graphic element for displaying said associated segment of textual description and a column or a page number, and a line-range number, in said single document for said associated segment of textual description and at least a figure number of said associated graphic element.

6. (Currently Amended) The document management and review system implemented in the computer of claim 2 further comprising:

a user interface provided for allowing a user to input a user-selected alpha-numeral designation to invoke said search and link processing module for searching within said single processor-recognizable file incorporating said single document for said user-selected alpha-numeral designation and for linking said user-selected alpha-numeral designation to an associated segment of textual description including and describing said naming term designated by said user-selected alpha-numeral designation in said document; and

said display processing module is further provided for displaying at least a drawing having a graphic element linked by said user-selected alpha-numeral designation for displaying with said naming term described in said textual descriptions associated with said user-selected alpha-numeral designation immediately and directly next to said graphic element whereby said document reviewer can directly and graphically view said drawing with said user selected alpha-numeral designation simultaneously with said naming term described in said textual descriptions disposed immediately next to said graphic element.

7. (Currently Amended) A method of processing a naming-term based and graphically aided document review and management comprising:

- a) employing a document reading processing module for reading a single document having textual descriptions and at least a drawing having a plurality of graphic elements wherein each of said graphic elements is assigned and illustrated with an unique alpha-numeral designation specific to the graphic element;
- b) converting said document including said graphic elements and said alpha-numeral-designation to a plurality of processor-recognized elements and incorporating said textual descriptions and said plurality of processor-recognizable elements into a single processor-recognizable file;
- c) employing a search and link processing module for searching within said single processor-recognizable file for said processor-recognized elements and linking each of said alpha-numeral designation with at least one associated segment of textual description including and describing a naming term and designated by said alpha-numeral designation in said at least one associated segment of textual description; and
- d) displaying said drawing with said naming-term as designated by said alpha-numeral designation and described in said at least one associated segment of said textual description wherein said name term is displayed immediately and directly next to said graphic element marked by said alpha-numeral designation whereby a document reviewer can directly and graphically view and associate said graphic element together with said naming term as described in said textual descriptions.

8. (Currently Amended) The method of document management of claim 7 wherein:

said step c) further includes a step of employing a document-location-finder processing module for locating a column or page number, and a line-range number in said single document for said at least one associated segment of textual description; and

said step d) of displaying said naming term described in said textual descriptions immediately and directly next to said graphic elements further displaying said column or page number, and said line-range number in said single document for said segment of textual description for said graphic elements each displayed immediately and directly adjacent to said naming term as described in said textual descriptions.

9. (Currently Amended) The method of document management of claim 7 further comprising:

e) employing a user interface for allowing a user to input a user-selected naming-term to invoke said search and link processing module for searching within said single processor-recognizable file incorporating said single document for said user-selected naming-term and for linking said user-selected naming-term to an associated segment of textual description in said document that includes and describes said user selected naming term designated with an alpha-numeral designation and for linking to an associated graphic element for displaying said associated segment of textual description including said user selected naming term immediately and directly next to said associated graphic element.

10. (Currently Amended) The method of document management of claim 7 further comprising:

incorporating said alpha-numeral designation with said naming term described in said textual descriptions and said at least one associated segment of said textual descriptions in a database wherein said naming term described in said textual descriptions is linked to said at least one associated segment of textual description includes and describes said naming term and designated by said alpha-numeral designation.

11. (Previously Presented) The method of document management of claim 7 further comprising:

e) employing a user interface for allowing a user to input a user selected graphic element naming-term to invoke said search and link processing module for searching within said single processor-recognizable file incorporating said single document for said user-selected graphic element and for linking said user selected graphic element naming-term to an associated segment of textual description that including and describing said user-selected graphic naming-term and for displaying said associated segment of textual description and a column or page number, and a line-range number in said single document for said associated segment of textual description immediately and directly next to a graphic element displayed with said user-selected graphic element naming-term.

12. (Currently Amended) The method of document management of claim 7 further comprising:

- e) employing a user interface for allowing a user to input a user-selected naming-term to invoke said search and link processing module for searching within said single processor-recognizable file incorporating said single document for said user-selected naming-term and for linking said user-selected naming-term to an associated segment of textual description including and describing said user-selected naming-term designated by an alpha-numeral designation for linking to an associated graphic element; and
- f) displaying at least a drawing with said associated graphic element and said associated segment of textual description including said user-selected naming-term immediately and directly next to said associated graphic element.

13. (Currently Amended) A naming-term based and graphically aided document review and management system implemented in a computer for reading a single document having textual descriptions and at least a drawing consisted of graphic elements wherein each graphic element is designated with an unique alpha-numeral designation specific to said graphic element and associated with a naming term included and described in said textual description in said single document incorporated in a single processor-recognizable file, comprising:

a display processing module for displaying said drawing with said naming term as designated by said alpha-numeral designation and described in at least one associated segment of said textual descriptions wherein said naming term is displayed immediately and directly next to said graphic element whereby a document reviewer can directly and simultaneously view and associate said naming term as described in said textual description to said graphic element illustrated and designated with said unique alpha-numeral designation as said alpha numeral designation designating said naming term without requiring a processor to process multiple files.

14. (Currently Amended) The document review and management system implemented in a computer of claim 13 wherein:

said display processing module is further provided for displaying a column or page number, and a line-range number in said single document along with said segment of textual description immediately and directly next to said naming term displayed immediately next to said graphic element in said drawing.

15. (Currently Amended) The document review and management system implemented in a computer of claim 13 further comprising:

a user interface provided for allowing a user to input a user-selected naming-term for searching within said single processor-recognizable file for said user-selected naming term and for linking said user-selected naming-term to an associated segment of textual description including and describing said user-selected naming term and a figure number of an associated graphic element linked by said user-selected naming term described in said associated segment of textual descriptions for displaying said associated segment of textual description together with said figure number of said associate graphic element included in said drawing.

16. (Currently Amended) The document review and management system implemented in a computer of claim 13 further comprising:

a user interface provided for allowing a user to input a user-selected naming-term for searching within said single processor-recognizable file for said user-selected naming term and for linking said user-selected naming-term to an associated segment of textual description including and describing said user-selected naming term and an associated graphic element related to said user-selected naming-term for displaying said user-selected naming-term together with said associated segment of textual description immediately and directly next to said associated graphic element in said drawing.

17. (Currently Amended) The document review and management system implemented in a computer of claim 13 further comprising:

a user interface provided for allowing a user to input a user-selected naming-term for searching within said single processor-recognizable file for said user-selected naming term and for linking said user-selected naming-term to an associated segment of textual description including and describing said user-selected term and for displaying said user-selected naming term together with said drawing and said associated segment of textual description with a column or page number, and a line-range number in said single document for said associated segment of textual description in said single document.

18. (Currently Amended) The document and review management system implemented in a computer of claim 14 further comprising:

a user interface provided for allowing a user to input a user-selected naming-term for searching within said single processor-recognizable file for said user-selected naming term and for linking said user-selected naming-term to an associated segment of textual description including and describing said user-selected naming term for linking to an associated graphic element in said drawing related to said user-selected naming-term; and

said display processing module is further provided for displaying a drawing showing said associated graphic element with said associated segment of textual description and said column or page number, and said line-range number in said single document for said associated segment of textual description displayed immediately and directly next to said graphic element.

19. (Currently Amended) A method for reading and managing a single document having textual descriptions and at least a drawing consisted of graphic elements each designated with an unique graphic element designation and associated with a naming term assigned by an unique alpha-numeral designation the same as one of said graphic element designation and described in one of said textual descriptions of said single document incorporated in a single processor-recognizable file, comprising:

employing a display processing module for displaying said drawing with said naming term included and described in said textual description for displaying said naming term immediately and directly next to said graphic element assigned by said unique graphic element designation the same as the alpha-numeral designation of said unique naming term described in said textual descriptions whereby a document reviewer can directly and simultaneously view and associate said naming term described in said textual descriptions to said graphic element without requiring a processor to process multiple files.

20. (Currently Amended) The method of claim 19 wherein:

said step of displaying said drawing further comprising a step of displaying an associated segment of textual description including descriptions of said naming term for said designated graphic element immediately and directly next to said graphic element designated by said naming term described in said textual descriptions.

21. (Currently Amended) The method of claim 19 further comprising:

employing a user interface for allowing a user to input a user-selected naming-term for searching within said single processor-recognizable file for said user-selected naming term and for linking said user-selected naming-term to an associated segment of textual description including descriptions of said user-selected naming term and for linking to an associated graphic element related to said user-selected naming term for displaying a drawing together with said associated segment of textual description including said user-selected naming term immediately and directly next to said graphic element.

IX) Evidence Appendix

NONE

X) Related Proceedings Appendix: None

NONE

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REMARKS

In response to the Examiner's Action mailed on November 3, 2009, claims 1 to 10 and 12 to 21 are amended and the Applicant would like to respectfully requests that the patent application be reconsidered and allowed.

An item-by-item response to Examiner's objections or rejections is provided in the followings:

1. Rejection of Claims Under 35 USC 112:

The Examiner rejects claims 1-21 under 35 U.S.C. 112 first paragraph as failing to comply with the enablement requirement.

In response to the rejections, claims 1 to 10 and 12 to 21 are amended and the term "descriptive naming term" is removed and a "naming term" is now clearly defined and supported by the description in the specification.

2. Rejection of Claims Under 35 USC 112:

The Examiner rejects claims 1-21 under 35 U.S.C. 112 second paragraph as being indefinite for failing to particular point out and distinctly claim the subject matter which applicant regards as the invention.

In response to the rejections, claims 1 to 10 and 12 to 21 are amended and the claim elements that lack antecedent basis or indefinite are removed and the informalities in the claims are corrected.

3. Rejection of Claims Under 35 USC 103:

The Examiner rejects claims 1-21 under 35 U.S.C. 103(a) as being unpatentable over Rivette et al., US 5,991,780 A priority filed 11/19/1993 in view of Krause et al., US 5,625,827 filed 12/23/1994.

In response to Examiner's rejections, the "naming term" in the independent claims, i.e., claims 1, 7, 13, and 19 are amended to clearly and definitely specified as a term that satisfied all three conditions set forth below:

- 4) A naming term is a term described in a textual description.
- 5) A naming term is a term that is designated in the textual descriptions with a unique alpha-numeral designation.
- 6) A naming term is a term shown as a graphic element in a drawing of the document designated by the same unique alpha-numeral designation.

In this invention, each graphic element is designated by a "unique alpha numeral designation" that is specific to the graphic element. This unique designation is necessary because it is necessary to search a naming term that is also assigned by this unique alpha numeral designation to associate with a graphic element and then display the naming term next to the graphic element. The search and display depend on a unique alpha numeral designation for each graphic element.

With the amendment, compared to Fig. 5 of Krause, the amended claims 1, 7, 13 and 19 would not be obvious under Rivette and Krause and would be allowable. Specifically, Krause discloses on Fig. 5 an unique alpha-numeral designations of "65" designated to a naming term "window" (see column 9, line 24, and line 26), and in Fig. 4, another unique alpha-numeral designation 55 designating another naming term "hotspots" (see column 7, line 44, and line 50-51). However, none of the naming terms "window" or "hotspots" have been displayed next to the graphic elements. Furthermore, the alpha-numeral designations A, B, C, are designated to "hotspot". However, Krause did not show the naming term "hotspot" next to any of the graphic elements designated by the unique alpha-numeral designations A, B, or C. For these reasons, the naming term as now amended and more clearly defined as now included in the amended claims would differentiate further from the disclosures made by Rivette and Krause. A combination of Rivette and Krause would not enable a person of ordinary skill to devise the inventions directed by the claims as now amended because Krause did not show a display any of the naming terms assigned by an unique alpha-numeral designation (both in the textual descriptions and to the

graphic element), next to the graphic element(s) as now more clearly specified in this invention.

Furthermore, the Applicant would like to respond to Examiner's points as recited in the Office Action mailed on November 3, 2090.

On pages 55 and 56 the Examiner recites that:

"Krause teaches a descriptive naming term, such as "fixed base clip", as shown in Figure 5, which is a descriptive naming term descriptive (i.e. comprehensively understandable by the reader) of the graphic element shown in Figure 5 and depicting a fixed base clip. These descriptive naming terms taught by Krause identify and describe the graphic elements to which they are associated and are displayed on the drawing immediately next to the graphic element to which they are associated, as clearly shown by Krause in Figure 5, as well as in Krause Figure 6, which presents additional examples of textual phrases that identify graphic elements and that are displayed immediately next to the graphic elements they identify, such as, by way of example, "Soffit Section" (See Krause, Figure 6)." (Underline added)

Applicant's Response:

The Applicant would like to respectfully disagree with the Examiner about Examiner's point that "Krause teaches a naming term" because Krause shows the terms "Fixed Base Clip" and "SOFFIT SECTION" in Figs. 5 and 6. The Examiner provides bases for identifying these terms as "naming term" because these terms are comprehensively understandable by the reader of the graphic element. However, according to the clear and specific languages in claims 1, 7, 13 and 19, a term appears on the drawing that is merely "comprehensively understandable by the reader of the graphic element" is NOT a "naming term". The graphic elements "Fixed Base Clip" and "SOFFIT SECTION" in Figs. 5 and 6 are NOT assigned by any alpha-numeral designation. Furthermore, even if they are naming terms, there is no way to conduct a search to associate the naming term "Fixed Base Clip" and "SOFFIT SECTION" with a segment of the textual descriptions. According to this invention, the search depends on the unique

alpha-numeral designation to associate the naming term and the textual descriptions to the graphic element both assigned by the same alpha-numeral designation based on the claims of this invention.

In contrast, the invention as disclosed of Krause does not require such an association because Krause relies on the "hotspots" to call up another file or document. According to Krause "The "A" hotspot will call up a textual description which is a note or text file named A in memory 30 as illustrated in Fig. 5" (Krause column 9, line 37 to 39). The association process and mechanism for reviewing the documents of Krause is totally different from this invention. For this reason, the disclosures as made by Figs. 4 to 7 and the descriptions of these figures in Krause point to a different invention and a combination of Krause and Rivette would not make this invention obvious. Furthermore, there are differences that clearly differentiate the invention according to the claims now amended are different from Krause and Rivette because of the following reasons:

- E) The terms "Fixed Base Clip" and "SOFFIT SECTION" as shown in Figs. 5 and 6 ARE NOT naming terms because these terms have not been described in the textual descriptions.
- F) . The terms "Fixed Base Clip" and "SOFFIT SECTION" as shown in Figs. 5 and 6 ARE NOT naming terms because these terms have not been designated by alpha-numeral designation in the textual description.
- G) The terms "Fixed Base Clip" and "SOFFIT SECTION" as shown in Figs. 5 and 6 ARE NOT naming terms because these terms have not been designated by alpha-numeral designation as a graphic element in the drawings shown in Figs. 5 and 6.
- H) The terms "Fixed Base Clip" and "SOFFIT SECTION" as shown in Figs. 5 and 6 ARE NOT naming terms because these terms cannot provide a link between the textual descriptions and the graphic element due to the facts that the graphic elements "Fixed Base Clip" or "SOFFIT SECTION" as shown in Figs. 5 and 6 have not been designated by a unique alpha-numeral designation. There is no way to link these graphic elements to relevant textual descriptions that describe a graphic element associated by the unique alpha-numeral designation.
- II) For claims 1, 7, 13, and 19, the Examiner recites the following statements as provided on page 10 to 12 for claim 1 (and essentially similar reasons of rejections

are provided as that for claim 1 are also recited for claims 7, 13, and 19). The Applicant would like to respectfully respond to each point as the followings:

- 6) While Rivette does not teach expressly that the textual descriptions include describing said descriptive naming term designated by said alpha-numeral designation, Krause teaches textual descriptions included in a secondary document that describes said descriptive naming term, such as describing the descriptive naming term which is designated by said alpha numeral designation "A" (See Krause, Figure 5, element 65).

Applicant's Response:

- d) From the above statements as cited by the Examiner, the Applicant is not sure which is considered as the alpha-numeral designation. Is it "A" the alpha-numeral designation or "65" the alpha-numeral designation? The Examiner seems to imply that both "A" and "65" are alpha-numeral designations.
- e) Suppose both "A" and "65" are alpha-numeral designations, Fig. 5 does not show a "naming term" together with either "A" or "65". Therefore, what have been shown on Fig. 5 would not make the invention of this application obvious since there is no naming term shown immediately next to the alpha-numeral designations of the graphic elements.
- f) Even that what recited by the Examiner that "Krause teaches textual descriptions included in a secondary document that describes said descriptive naming term, such as describing the descriptive naming term which is designated by said alpha numeral designation "A" is true, it would still not make this invention obvious because what can be called up by "A" is not specifically shown in Fig. 5, as that required by the claims of this invention, and a document reviewer is still required to call up another document (either a note or a textual file" to understand what are represented by hotspot "A".
- 7) Krause teaches each descriptive naming-term displayed immediately and directly next to the graphic elements in fig. 3-5 and col. 5 lines 7-18. See specifically Krause, Figure 5, showing a descriptive naming term, such as "building paper", for example, displayed immediately and directly next to said graphic element. The graphic elements and the text labels and text descriptions are all readily available to the user on one screen.

Applicant's Response:

- d) From the above statements as cited by the Examiner, the Applicant is not sure if "building paper" is a "naming term" and what is pointed by "building paper" through an arrow is actually and indeed a "building paper" (i.e., paper covering over a vertical wall as "building paper"). Instead, a detail reading of the entire document and the descriptions of Fig. 5 would more likely indicate that the term "building paper" is not meant to show there is a "building paper" that covers the vertical wall pointed by the arrow next to the "building paper". More likely, the term "building paper" is an indicator of a "secondary document" (that is a "building plan), within a primary document. (See the description of Krause in column 9, lines 17 to 44, on "secondary document" and the "primary document" shown in different "windows 65").
- e) If the "building paper" is a naming term, then Fig. 5 and 6 do not show that "building paper" is assigned with an alpha-numeral designation. The Examiner recites that "the text labels and text descriptions are all readily available to the user on one screen", but the text labels "A". "B" are hotspots and have nothing to do with the "building paper" as a naming term, and the text descriptions shown in these figures are not related to the term "building paper" and would not help a document reviewer to understand the graphic element pointed by the "building paper". The only way that can help the reviewer is for the reviewer to call up the "building paper", i.e., another building plan as a "second document".
- f) According to above discussions, Krause teaches a totally different way of reviewing and understanding the building plans and construction blueprints. The disclosures made by Krause would not have been relevant because of these differences.
- 8) Krause teaches that the hotspots annotate a primary document and link to a textual description in a secondary document. These documents could be document parts for example in a hierarchical compound document and thus the textual description invoked by the hotspot could be part of the same document as the graphical document containing the hotspot. Additionally Krause teaches that the descriptive naming term may be described in at least one associated segment of a textual description also displayed immediately and directly next to said graphic element (See Krause, Figure 6, showing

descriptive naming term "1/A34" displayed with textual description "Soffit Section" immediately and directly next to a graphic element of a soffit section).

Applicant's Response:

- e) According to the convention of the drawings as shown in Figs. 4 to 7, the symbol "1/A34" is enclosed in a circle. The symbol "1/A34", enclosed in a circle, like other symbols "A", "B" and "C" in a circle, is a "hotspot", and not a "naming term". (Please see Fig. 4 and the description of the alpha numeral designation "55" as hotspots".)
- f) A person of ordinary skill in document review and management when review the disclosure made by Krause would not misunderstand "1/A34" shown in a circle as a "naming term" and "softfit section" as "textual description" of the naming term.
- g) Krause actually applies the hotspot "1/A34" as a hotspot to call up another document to review the details of the "soffit section". The soffit section is a name of the "hotspot 1/A34" and not a textual description because "soffit" is not a descriptive word and cannot explicitly and comprehensively describe the graphic element. A document must call up another document linked by the hotspot 1/A34 in order to more comprehensively understand the details of the building plan and the construction blueprints.
- h) For these reasons, Krause teaches a totally different system and process to manage, retrieve and review document. A combination of Krause and Rivette would not enable a person of ordinary skill to devise a document review system as now direct by the claims as now amended.
- 9) It would have been obvious to one of ordinary skill in the art at the time the invention was made to have modified Rivette with Krause and teachings of Applicant's disclosure to have created the claimed invention. One of ordinary skill in the art would have taken the text of Rivette and used it to replace the numbered labels on the images, as is done in Krause, through the use of automatic link generation systems and techniques which Applicant's specification teaches were readily available in the market. It would have been obvious and desirable to make this modification such that the combined image and text information would have been easier to read.

Applicant's Response:

- d) Krause is a system to review and manage building plan and blueprints that are mostly graphic documents with very little textual descriptions, i.e. "note" that are brief descriptions, because the reviewing of the graphic is more important for these types of documents.
 - e) For reviewing of building plans and blueprints, it is more important to check different levels of details and therefore it is important to call up several levels of "primary documents" and "second documents". The disclosure of Rivette is to manage patent applications. The natures of these two systems are totally different in terms of the interests and emphases of reviewing the documents. Therefore, a person of ordinary skill in the art would not like to refer to a document review system for managing hierarchical level of building plan files relevant.
 - f) As discussed above, since Kraus did not disclose the naming term assigned by unique alpha-numeral designation displayed with textual descriptions or naming term with the alpha-numeral designation, even a combination of Rivette with Krause would not enable a person of ordinary skill in the art to create a display as now pointed by the claims as now amended.
- 10) It is noted that in the example immediately above, "bolt" is the same thing as "12." Displaying one or the other in association with a graphic fully identifies the graphic. Associating both the name "bolt" and the number "12" in association with the graphic is more informative, but essentially duplicative. This relationship is noted in support of the conclusion that it would have been obvious to one of ordinary skill in the art at the time of the invention to identify a graphic by either the name or the number or both. The motivation for using both is for convenience is not having to look up the name associated with the number, or the number associated with the name. Therefore, it would have been obvious to one of ordinary skill in the art at the time of the invention to have modified the invention of Rivette, according to the teachings of Krause to display both a name and a number for a graphic item, as is specified in claim 1.)

Applicant's Response:

- d) The Applicant is confused by this statement because the Office Action does not seem to make reference to "'bolt' is the same thing as '12.'"

- e) Even that the "bolt" and "12" are meant to be pointing to the same graphic item, a graphic element merely shown with "12" may not be sufficient comprehensive to a document reviewer. The Examiner is correct that a display that shows the term "bolt" together with "12" would provide a reviewer more information to better understand the drawings and that is the main purpose of this invention.
- f) However, the Applicant would respectfully disagree with the Examiner that such display is obvious merely because "bolt" and "12" together with "textual descriptions" would be obvious. As discussed above, neither Rivette and Krause show such display, this invention discloses new, different and not obvious inventions over the disclosures over Rivette in view of Krause.

With the claims as now amended and the reasons provided above, the applicant hereby respectfully requests that Examiner's rejections under 35 USC §112 and 35 USC § 103 be withdrawn and the present application be allowed.

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- 1) Texture descriptions included in a *secondary document* that describes said NAMING TERM, such as describing the NAMING TERM which is designated by said alpha numeral designation "A" (Krause Figure 5, element 65).
- 2) Furthermore, it would have been obvious to do so providing the benefit of allowing the user to obtain additional information with regard to the naming term that *may not be conveniently display on the initial display screen*.
- 3) Krause teaches each NAMING TERM displayed immediately and directly next to the graphic elements in Figs. 3-5 and col. 5 lines 7-18, specifically ***Krause Fig. 5, showing a NAMING TERM SUCH AS "BUILDING PAPER".***

For convenience of reference and comparison, two paragraphs of Krause's disclosures included in column 5, lines 7-18 as cited by the Examiner are also copied below for a more careful and detail review.

The indicating means 48 includes labeling means 50 which places a name and label at the hotspot 55 which identifies the secondary document by file name. It is to be further understood that a secondary or detail document may act as the primary document so that it may include a hotspot 55 which references a different secondary document for call-up.

The indicating means 48 also includes linking means 52 for displaying the secondary document when the hotspot 55 is activated. Activation of a hotspot 55 occurs by clicking or actuating the hotspot 55 by the mouse/cursor 20, or using the keyboard 16 with cursor/enter. The linking means 52 accesses the name of the secondary document in the hotspot 55 to call up the secondary document. The secondary file is identified by the name in the hotspot 55, and the processor means 13 automatically displays the secondary document upon activation of the hotspot 55. It is to be understood that the secondary document may be comprised of either graphic drawings or text, or may cause other external devices to be activated. The secondary document identified by the hotspot 55 is placed

on top of the primary, calling document on the display screen 14, as subsequently discussed. (Column 5, Lines 7 to 28 of Krause Patent).

The Applicant would like to respectfully disagree with the Examiner according to above three instructions as provided by the Examiner.

- 1) The claims of this invention are directed to a SINGLE DOCUMENT and Krause disclose a system to correlate among many documents and files by NAMING FILE NAMES and DOCUMENT NAMES. Krause actually teaches away from the invention as directed by the claims now amended.
- 2) After careful reviews of Figs. 3-5 and careful reading of Krause disclosures including the above sections cited by the Examiner, the figures DO NOT show any NAMING TERMS at all. According to the Description of Krause on Column 9 lines 32 to 44 as copied in the followings:
 "As an example of the system, an elevational view is illustrated in FIGS. 4-5 as displayed on the display 14 with the function bar there-along. This may be considered the primary document which includes a north elevation view. Located on these drawings are **four hotspots: A, B, C,** and numbered hotspots. The "**A**" hotspot will call up a textual description which is in a note or text file named A in memory 30 as illustrated in FIG. 5. Subsequent activation of the hotspot "**B**" will call up the B file and display same in a cascade fashion on the computer screen as in FIG. 5. The B file may be a sectional view as is illustrated. Thereafter, each of these documents may be exited in order to return and display the full primary document as in FIG. 4. (Column 9, lines 32-44),
 "**A**", "**B**" and "**C**" are alpha numeral designations for a naming term "hot spot", but "hot spot" have never been displayed with any of the alpha-numeral designations. Therefore, Krause does not teach a display of "Naming Terms" directly and immediately next to the graphic element as directed by the invention now amended.
- 3) Alpha number designation 65 is described as "Window". Accordingly ""Window" is a naming term for the designation "65" in Krause. But all the drawings of Kraus have not shown "WINDOW" directly and immediately next to the graphic element pointed by the alpha numeral designation "65".

- 4) The Applicant would like to respectfully disagree with the Examiner and point out that "Building Paper" is NOT a NAMING TERM. The term building paper has never assigned with any alpha numeral designation and the term "BUILDING PAPER" has never been described in the text of Krause's Specification.
- 5) A careful review of Figs. 3-5 (and all other figures of Krause) and all figures of Rivette, there have no naming terms directly and immediately displayed next to the graphic element.

In response to the rejections, in order to more specifically clarify and limit the scopes of the inventions, claims 1-21 are further amended. For example claim 13 is amended to direct to:

A naming-term based and graphically aided document review and management system implemented in a computer for reading a single document having textual descriptions and at least a drawing consisted of graphic elements designated with graphic element designations associated with a naming term included and described in said textual description in said single document incorporated in a single processor-recognizable file, comprising:

a display processing module for displaying said drawing with said **naming term as described in said at least one associated segment of said textual description wherein said name term is** displayed immediately and directly next to said textual description of said single document incorporated in said single processor-recognizable file whereby a document reviewer can directly and simultaneously view and associate said naming term as described in said textual description to said graphic element without requiring a processor to process multiple files.

The claims 1 to 21 as now amended are clearly out of the scopes and not obvious over Rivette and Krause. Furthermore, the Applicant would respectfully direct Examiner's attention to the differences between this invention and Krause to further emphasize that Krause teaches away from the invention according to

the claims as now amended.

The Applicant would like to respectfully submit that the disclosures made by Kraus actually and practically teach away from combining the multiple files into a single file as suggested by the Examiner. Krause teaches a system to store the construction drawings or blueprints in a plurality of computer files. Krause's inventions includes a method for manipulating a plurality of document files including construction building drawings in a computer memory to select "at least two measuring points in the drawing; and automatically determining a measured quantity represented by the measuring points scaled to the full scale dimension (**Krause column 2, lines 16-19**). For a system to store and manipulate construction drawings and blueprints, it would not be desirable or practical to combine these multiple files into a single file. Different subcontractors may handle different parts of the construction project. Each subcontractor would prefer to access a separate file without the requirement to invoke a single huge file that contains large amount of drawings and descriptions not necessarily related to the part managed and handled by different subcontractors. It is further undesirable to allow different subcontractor teams to access the design and detail blueprints unrelated to the construction jobs by combining the plurality of files into a single file.

For these reasons, the Applicant would like to respectfully disagree with the Examiner's application of Kraus in view of Rivette as a basis for obviousness for combining multiple blueprints and construction drawings into a single file. The disclosures as made by Krause when combined with Rivette actually teach away from this invention in processing a single file or a single document as already amended.

With the added elements, the amended claims have more limited scopes and further distinguish from Rivette and Krause with distinguishing advantages of easier to review/process with simplified processes incorporated in a software system that neither Rivette nor Krause has ever suggested or motivated. Specifically, the amended claims are further differentiated from Krause:

- 1) The "alpha-numeral designation" in Krause, i.e., the "hot spots A, B, C", are used by Krause and named as "Hot Spot" only to link to different files

or “note”, but these naming terms, i.e., “Hot Spot” have never been displayed directly and immediately next to the graphic elements in the drawings. The claims as now amended for this invention further specifically limited to the naming terms that are described in the textual descriptions and shown immediately and directly next to the graphic element named by the naming term.

- 2) The display of Krause of these hot spots A, B, C are shown in a different “Windows” and not “immediately and directly next to the graphic element. The display shown in Fig. 5 with different display “windows” are actually away and NOT directly related to the graphic elements but a different level of the “hot spots”. The claims as now amended are different, not obvious when compared with the display shown in Fig. 5 of Kraus that actually teaches away from the invention as now amended with more specific, limited and narrower scopes.

For these reasons, the Applicant respectfully request that the Examiner’s rejection be withdrawn for the amended claims.

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